

IMPLEMENTATION BY TARGET AUDIENCE

◆ BUSINESSES ◆

Situation Analysis Overview

For the business communities, many of the salient points of the general public apply. The focus groups conducted by the County in November 1996 revealed that the *individual people* working within this audience have a moderate to well-informed base of general information about stormwater/urban runoff pollution. This is likely due to the previous outreach efforts targeted to members of the general public. However, with few exceptions, the Businesses audience *as a whole* needs more information and better knowledge of good, anti-polluting business practices. BMP manuals and training programs that are developed will not only have to provide basic education, but also provide specific industry-related information and “how to” activities that are meaningful and motivate businesses to change behavior.

The Fall 1996 focus groups were conducted with managers and employees of restaurants, auto repair shops and construction companies to gain insight related to the current practices, concerns and motivations for these businesses that were specifically identified in the NPDES Permit. In addition, baseline awareness surveys were conducted for the same business groups in Spring 1997. The following sections include many of the findings of the focus groups and awareness surveys. They provide an overview of some of the barriers and issues that make BMP compliance challenging for both the environmental regulator and the businesses being regulated. These barriers and issues must be kept in mind as the Public Education Plan is developed and implemented.

Target Audiences

Outreach and education to businesses in Los Angeles County will support the Model Programs which target the following groups of facilities or businesses:

- ◆ Phase 1 facilities
- ◆ Specific businesses identified in the Permit: motor vehicle repair and body shops, automotive parts/accessories facilities and restaurants
- ◆ Construction and new development
- ◆ Any additional industrial/commercial facilities that are identified by the Watershed Management Committee as having high pollution generating activities with widespread impact on the County

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Regulations and Conflicting Regulatory Solutions

While many owners and workers feel burdened by regulations, they also realize they are necessary. Penalties and fines are still the most powerful incentives for compliance; however, many high-risk industrial businesses also want to feel that they are part of the solution, not part of the problem. Beyond pollution prevention, avoidance of work accidents and disposal of waste in a safe manner are strong motivators.

In some cases, businesses report that solving one problem through regulation or practice creates another. For example, it is against food handling regulations to wash non-food materials (i.e., floor mats) in sinks where food is handled; however, these materials invariably are then carried outside to be cleaned where the water and debris wash into the storm drains.

Additionally, related businesses can impact each other's BMP compliance. For example, if a business contracts with a waste disposal company to provide roll-off containers to collect waste, and the container leaks, BMP compliance has been negatively impacted by a force outside their control and becomes another problem to be addressed.

Compliance Can Be As Easy As "Good Housekeeping"

In many instances, implementing BMPs is a simple matter of good housekeeping. However, the degree of thoroughness and completion is impacted by time, convenience and equipment. Also impacting BMP compliance is training the appropriate personnel -- management as opposed to the workers who are most responsible for basic housekeeping jobs such as cleaning, disposal of waste, tidying areas and putting things in proper places.

Community Reputation

A company's or business's desire to continue and enhance its good reputation within the community can provide a strong motivator in complying with BMPs -- particularly if the company can tap into a customer base that shows a preference for doing business with an environmentally friendly enterprise.

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Size of Operation Counts

Focus groups brought out that compliance with BMPs varies according to the size of the operation. Typically, larger companies/businesses already have some form of BMP program in place.¹⁷ Infractions are more prevalent in the small, owner-operated businesses where cost impacts can be greater than in larger businesses, especially if specialized equipment or time-consuming procedures are needed. Small companies use BMPs if they: (1) help them comply with regulations; (2) are easy; and, (3) don't cost (or even save) money.

Threats to Compliance

While some BMPs are as easy as good housekeeping, others can be more difficult to implement. There can be increased costs of doing business with some BMP implementation, especially when a business lacks the specialized equipment or the facility set-up, and can't afford the cost of obtaining this equipment. Costs of compliance would be passed on to the customer in higher charges or higher bid prices for proposed jobs. These can decrease a business' competitiveness. The cost of doing business in an already tenuous business climate can be impacted when new or expanding companies feel they are burdened with BMP implementation costs. The challenge is compounded when established businesses that have always done business a certain way are now expected to implement changes that cost money.

Reasons for Adherence to BMPs

According to focus group findings, individuals in the business sectors follow waste disposal rules for a variety of reasons:

- ◆ personal safety
- ◆ fear of fines and penalties
- ◆ fear of exposure to carcinogenic materials
- ◆ customers' expectations

¹⁷ *Residents and Industry Stormwater Awareness, Practices and Communications Report*, Ibid. And, confirmed by inspectors of the Los Angeles County Department of Public Works, November 1996.

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Barriers to BMP Compliance

Barriers to BMP compliance were discussed in the focus groups and include the following:

- ◆ lack of financial incentive and/or financial disincentives
- ◆ scarcity of recycling centers
- ◆ difficulty in teaching non-English speaking workers
- ◆ apathetic workers are difficult to motivate
- ◆ lack of information
- ◆ lack of proper equipment
- ◆ lack of personal empowerment

Messages and Practices

The business/industry focus groups indicate that much of the timeline and message discussion in the General Public/Residents section (pages 37 and 38) holds true for the Businesses audience. In addition to comments in this earlier discussion, the business/industry focus group found it especially important that messages and activities positively reinforce exemplary practices. Additionally, consideration must be given to some business programs and activities that may need to be modified to address cultural and business sensitivities within certain ethnic communities.

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◆ BUSINESSES - - GOALS ◆

- ◆ Increase awareness among business/industrial and construction audiences about stormwater pollution prevention and its value, and specifically about the problem of illicit discharges/dumping and proper discharge/disposal practices.
- ◆ Work with businesses and agencies to overcome hurdles to BMP compliance.
- ◆ Gain acceptance of specific stormwater/urban runoff pollution prevention BMPs by business, industrial and construction audiences as part of standard operating procedure.
- ◆ Increase the number of construction businesses' owners/managers that feel they are *very knowledgeable* about the causes of ocean, river and lakes pollution to 38% by the end of five years.
- ◆ Increase the number of auto repair businesses' owners/managers that feel they are *very knowledgeable* about the causes of ocean, river and lakes pollution to 43% by the end of five years.
- ◆ Increase the number of restaurant businesses' owners/managers that feel they are *very knowledgeable* about the causes of ocean, river and lakes pollution to 30% by the end of five years.
- ◆ Increase recall of messages that specifically address how the construction industry may contribute to pollution of ocean, rivers and lakes to 44%.
- ◆ Increase recall of messages that specifically address how the auto repair industry may contribute to pollution of ocean, rivers and lakes to 65%.
- ◆ Increase recall of messages that specifically address how the restaurant industry may contribute to pollution of ocean, rivers and lakes to 35%.
- ◆ Increase the propensity of construction owners/managers to train/educate their employees about proper waste disposal and clean-up practices, including holding company meetings (increase to 80%); conducting one-on-one training (to 62%); and displaying posters at the work site (to 48%).
- ◆ Increase the propensity of auto repair owners/managers to train/educate their employees about proper waste disposal and clean-up practices, including holding company meetings (increase to 88%); conducting one-on-one training (to 62%); and displaying posters at the work site (to 83%).
- ◆ Increase the propensity of restaurant owners/managers to train/educate their employees about proper waste disposal and clean-up practices, including holding company meetings (increase to 86%); conducting one-on-one training (to 90%); and displaying posters at the work site (to 64%).
- ◆ Decrease the number of construction business owners/managers who feel that waste disposal and clean-up activities are less important than other priorities to 0%.

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- ◆ Decrease the number of auto repair business owners/managers who feel that waste disposal and clean-up activities are less important than other priorities to 0%.
- ◆ Decrease the number of restaurant business owners/managers who feel that waste disposal and clean-up activities are less important than other priorities to 0%.
- ◆ Develop and utilize a grants and loans resource clearinghouse for County, Co-permittees and local businesses to identify and apply for additional financing for education programs and regulatory compliance activities.
- ◆ Coordinate with illicit discharge, development planning, development construction and public agency activities model programs.

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◆ B U S I N E S S E S ◆

Communications Approach

The business outreach component of the Five-Year Public Education Plan is intended to be practical, efficient, and good for businesses as well as the environment in Los Angeles County. The activities described in this section will meet the requirements of the NPDES Permit and work within the parameters of the Model Programs.

One of the most important methods of communication with the Businesses audience will be educational site visits. Some of the activities that are described on the following pages -- particularly the development of materials -- are intended to support these visits.

Because of the magnitude of the Businesses audience, another key communications approach is to reach as many businesses as possible through existing distribution avenues, beginning with major business and trade associations. Harder-to-reach target audiences that are not affiliated with such organizations will receive stormwater management education through local business development programs, trade publications, property management/real estate associations, vendors and various community-based outreach programs.

The communications activities for business audiences also will take into account that many Los Angeles County enterprises are trying to do the right thing, but have achieved limited success because of the lack of finances and/or a misunderstanding of their own potential to pollute. Education activities implemented in the General Public/Residents Audience will have a spillover effect on the individuals working in the targeted businesses and industries, and education activities within Businesses will have application to many sub-segments of Public Agency Employees. Strategies will be employed to provide resource assistance information (including information about financial assistance) and broad-based education on sound alternatives (BMPs) to prohibited, polluting activities.

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Snapshot of Activities

1. “How To” Printed Materials for Broad Range of Businesses
2. Other Educational Printed Materials (Posters, Signage)
3. BMP Workshops for Phase I and II Businesses; Forums and Educational Partnerships
4. Partnerships with Chambers of Commerce, Trade/Business Associations; “Hard-to-Reach” Businesses Outreach
5. Targeted Trade and Business Media Relations
6. Targeted Small Space Print Trade and Business Advertising
7. Advanced Technology and Telecommunications
8. Business/Industry Speakers Bureau
9. Database Clearinghouse of Organizations Providing Public Education Loans & Grants

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Activity 1 Production of Printed Materials for Use in Business Outreach Efforts

BMP “how to” materials/fact sheets targeted to a broad range of businesses and industries for use at public counters, in workshops, site visits, in the permit process and other outreach situations.

Description

Two separate printed components will comprise these modular BMP “how to” materials: (1) an overview BMP handbook and (2) specific BMP fact sheets-by-industry (for restaurants, automotive businesses, construction companies and related businesses) and by-activity (for Phase I facilities) based on information provided by the Model Program.

The overview handbook will serve as the foundation of the business/industry information and education package. It will provide a summary of stormwater management in Los Angeles County as well as a good housekeeping philosophy and practices that are applicable to all businesses. The graphic “look” of this piece will fit within the overarching approach developed for the Five-Year Public Education Plan.

Inside this handbook, modular and specific industry BMP fact sheets, checklists and applicable posters/flyers can be inserted that will specifically target the business(es) being educated.

The BMP fact sheets and checklists will:

- ◆ be developed with the Industrial/Commercial, New Development/Construction and Educational Site Visit Model Programs;¹⁸
- ◆ encompass a broad range and variety of Phase I and other specified businesses and industries;
- ◆ provide practical, “how-to” information presented in a user-friendly manner;
- ◆ have countywide application; and,
- ◆ be printed under a “group printing”¹⁹ system for cost-effective procurement by Co-permittees (as will the overall handbook)

¹⁸ Please see Appendices for a complete listing of BMPs developed through the Model Programs.

¹⁹ “Group printing” is a large quantity print run of a single item that provides a lower per unit cost than small quantity runs. This lower cost not only will reduce the printing costs for the Co-permittees, it also will reduce the man-hours in design, copywriting and pre-production work.

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Other educational information that can be inserted in the overview handbook includes:

- ◆ posters already developed by the County for the food and restaurant industry, auto repair, gas stations. Procurement of these posters is available under the “group printing” system
- ◆ *Blueprint for a Clean Ocean* already developed by the County. Procurement available under “group printing” system
- ◆ posters/flyers/brochures developed by individual Co-permittees
- ◆ personal communications from individual Co-permittees to specific businesses
- ◆ health, safety and product information sheets
- ◆ references and resources for further information

Distribution -- Activity 1

- ◆ By County and City inspectors during educational site visits
- ◆ Through County and City’s permitting process
- ◆ 1-888-CLEAN-LA and/or Co-permittee information telephone numbers
- ◆ Business conferences, workshops and trade shows
- ◆ Partnerships with Chambers of Commerce and Trade/Business Associations
- ◆ Public information counters

In addition, these BMP materials will be appropriate for use by public employees who work in the fields of construction, including plan checking, permit review and inspections; educational site visits; food preparation; fleet services/vehicle maintenance; grounds/park maintenance; materials purchasing and storage; environmental education; and waste management. (See Public Agency Employees, page 113)

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Production Schedule -- Activity 1

The schedule for producing BMP materials will be as follows:

- ◆ Overview handbook: Following the approval of the Five-Year Public Education Plan by the RWQCB. Estimated production date -- Winter 1997
- ◆ Specific BMP fact sheets/check lists: Following the approval of the Model Programs²⁰ by the RWQCB

The overview handbook will be designed first and “group printed” with a quantity anticipated to supply the needs of the County and the Co-permittees for a minimum of two years. It is anticipated that the initial overview handbook will be updated and re-printed during Year Three, producing a supply that will last the remainder of the Five-Year Program.

County Responsibilities -- Activity 1

- ◆ Develop BMP materials packages (overall handbook and fact sheets) including industry- and activity-specific, concise “how to” materials
- ◆ Provide translation/interpretation to appropriate languages as needed
- ◆ Coordinate with Model Programs, including educational site visit programs, on effective designs for multiple uses
- ◆ Develop a “group printing” system that enables Co-permittees to purchase materials at the lowest cost possible and with labor-efficiencies

Co-permittee Responsibilities -- Activity 1

- ◆ Purchase materials through the County’s “group printing” system of BMP materials and distribute them at City public counters, in appropriate workshops, during educational site visits and other business outreach opportunities
- ◆ *Optional:* Add City-produced materials to packets, as appropriate

²⁰ Please note that the Model Programs will be submitted individually, with deadlines ranging from March 31, 1997 to December 1, 1997. The development of the BMP materials for each of these areas will be staggered accordingly.

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Activity 2 Other Educational Printed Materials

Posters, flyers, signage and other appropriate collateral materials.

Description

The purpose of posters, flyers, signage and other similar printed materials is to relay relevant information about stormwater/urban runoff BMPs in a graphic format that is space-effective and that can be understood at a glance. These materials are typically displayed in high-traffic areas of businesses, so information can be viewed by employees repetitively, reinforcing the messages.

Factors to consider when selecting or developing BMP posters, flyers and signage are:

- ◆ Illustrations that are striking and show BMPs so well that only a short caption or written explanation is required
- ◆ Information that is fundamental, rather than in-depth or detailed
- ◆ Information that is reflective and supportive of the BMPs developed by the Model Programs
- ◆ Size of the material should take into account the potential of limited available space
- ◆ Production of the materials should take into account interior or exterior (weather-proof) posting and should be easily movable if the job is progressive
- ◆ Languages -- the most frequently used languages are English, Spanish and Chinese

Signage is particularly suited to help general contractors overcome worker-related challenges, such as training employees and subcontractors, including those who do not speak English. In addition, construction is allowed to progress only by passing permit inspection milestones; control of stormwater runoff is a permit requirement. Having highly visible and durable signage will help reinforce awareness of and cooperation with implementation of BMPs.

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Distribution -- Activity 2

- ◆ Inside the modular overview handbook
- ◆ By County and City inspectors during site visits
- ◆ Through County and City's permitting process
- ◆ 1-888-CLEAN-LA and/or Co-permittee information telephone numbers
- ◆ Business conferences, workshops and trade shows
- ◆ Partnerships with Chambers of Commerce and Trade/Business Associations
- ◆ Public information counters

In addition, these BMP materials will be appropriate for individual merchants who wash sidewalks and for use by public employees who work in the fields of construction, including plan checking, permit review, and inspections; educational site visits; food preparation; fleet services/vehicle maintenance; grounds/park maintenance; materials purchasing and storage; environmental education; and waste management.

Production Schedule -- Activity 2

- ◆ BMP posters for gas stations, auto repair shops, food and restaurant industry already are produced by the County. These are available at a low cost through the County's "group printing" system and will be replenished as available stock depletes.
- ◆ Additional BMP posters for businesses who have activities deemed high-priority through the Model Programs and Baseline Business Survey will be produced between March 7, 1997 and December 1997.

County Responsibilities -- Activity 2

- ◆ Make existing posters (food and restaurant industry, auto repair, gas station) available to Co-permittees through the "group printing" system
- ◆ Develop additional posters for high-priority business activities identified by the Model Programs and through the Baseline Business Survey
- ◆ Provide appropriate language translation/interpretation as needed
- ◆ Distribute materials through County distribution channels -- site visits, permit process, 1-888-CLEAN-LA phone number, workshops, conferences
- ◆ Produce a flyer on sidewalk washing for individual businesses

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Co-permittee Responsibilities -- Activity 2

- ◆ Purchase and distribute existing posters (food and restaurant industry, auto repair, gas station) and any new posters (e.g., sidewalk washing) made available by the County through its “group printing” system. Co-permittee distribution avenues: site visits, permit process, local hotline/help phone number, workshops, conferences
- ◆ As needed to respond to local issues, expand and develop posters, flyers, signage for businesses beyond the designated high-risk businesses

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Activity 3 BMP Workshops for High-Risk Businesses in Conjunction With Model Programs. Forums and Educational Partnerships Targeting Polluting Activities Common to a Broad Range of Businesses.

Workshops for auto repair, restaurants and new development/construction.
Forums and partnerships for common anti-polluting activities in a wide range of other businesses through collaborative workshops/conferences, trade schools/associations, tailgate meetings, peer education.

Description

For businesses and/or activities that are identified as high-priority -- those in large numbers and/or have a greater potential to pollute -- workshops will be developed and produced by the County. Specific businesses targeted for workshops include: auto repair shops, restaurants and new development/construction.

Workshops targeting Phase I businesses will focus on specific activities found to be of high priority in the Industrial/Commercial Model Program, such as manufacturers dealing with safe storage and handling of chemicals and other hazardous materials. It should also be noted that the Model Programs and Baseline survey may identify additional businesses that would benefit from BMP workshops.

The purpose of these workshops is to create a training opportunity to educate owners, managers and supervisors about stormwater/urban runoff BMPs related to their professions and the simple, relevant techniques and operations that can be used. In addition to educating these professions about stormwater pollution management, training should reinforce the incentives for businesses to implement BMPs -- achieve cost savings (when applicable), promote a safe working environment, protect employee health, comply with local, state and federal regulations and provide customer satisfaction.

Additionally, invitations will be extended to public agency employees (Public Agency Employee Activity 3) who hold municipal jobs in the professions and business practices presented in the business/industry annual workshops and partnerships' outreach.

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Workshop Targets

- ◆ Auto repair shop owners/managers
- ◆ Restaurant owners/managers
- ◆ New Development/Construction managers/supervisors
- ◆ Phase I Business owners/managers
- ◆ Other specific businesses indicated by Model Programs
- ◆ Municipal employees engaged in any of above activities

Forum/Partnership Targets

- ◆ Professional Trade Schools
- ◆ Trade Assn. Local Chapters
- ◆ General Contractors Licensing
- ◆ Vocational Programs
- ◆ Continuing Education
- ◆ Trade Shows and Conferences
- Chambers of Commerce
- ◆ Public Agency Employees

Materials Utilized -- Activity 3

- ◆ Overview BMP handbook and appropriate BMP inserts/check lists (See Activity 1)
- ◆ Other printed materials (See Activity 2)
- ◆ For construction and municipal activities workshops, the Public Employee's Trainer's Manual²¹ produced by the County includes slides, videos and handouts that can be used
- ◆ Materials and procedures identified in reports on the pilot business outreach program -- Southeastern Targeted Opportunities for Pollution Prevention (STOPP)²²
- ◆ Database of Phase I and other specific businesses being created for Model Programs (for notification purposes)

Timing/Frequency -- Activity 3

Beginning in 1998, workshops for businesses will be produced at the rate of six (6) every other year. Public employees who are most likely to benefit from these workshops are working in the following fields: vehicle/fleet maintenance, food services, planning and construction activities, inspections, parks and recreation, grounds and building maintenance and public works.

Businesses Workshops

Beginning in 1998, produce six (6) every other year in auto repair, restaurant and new development/construction, and three (3) Phase I businesses/activities.

²¹ *Municipal Activities-Volume 1 and Construction-Volume 2, Public Employee Trainer Manual* produced by Larry Walker Associates, with Harris & Company and Rogers & Associates. February 1997. One free set was distributed to each Co-permittee in March 1997.

²² For a copy of the final report of the STOPP pilot program please contact the County of Los Angeles Department of Public Works Environmental Programs Division or the State of California Department of Toxic Substances Control in Long Beach.

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Forums/Partnerships

Trade associations and businesses will be invited to participate in County/Co-permittee sponsored workshops. In addition, the County and Co-permittees will provide outreach and education (forums, trade shows, conferences, expert speakers, etc.) through a business/trade partnership twice annually (See Businesses audience, Activity 4).

County Responsibilities -- Activity 3

- ◆ Develop and produce annual workshops. Once the initial format is set (agenda, publicity, materials), it should be utilized for each workshop to avoid duplication and provide maximum cost- and time-effectiveness
- ◆ Research, develop and implement countywide business partnerships (chambers of commerce, trade/business associations) and programs for collaborative forums, conferences, trade shows, speakers bureau opportunities and expanded message distribution
- ◆ Determine effectiveness of the workshops as an educational tool early in the Five-Year Public Education Plan and adjust the approach if participation is low compared to the amount of effort required to produce the events
- ◆ As Principal Permittee, the County is responsible for assembling and maintaining a database of industrial/commercial facilities for use in the education site visit program. Note: This database will be an important tool to be used to invite businesses to appropriate workshops. The County's responsibility for creating the database is being *recognized* -- but *not repeated* -- in this activity of the Five-Year Public Education Plan

Co-permittee Responsibilities -- Activity 3

- ◆ Assist in publicizing the workshops, encouraging participation among local business owners/ managers and appropriate public agency employees, providing expert speakers, if needed
- ◆ Support the County in its countywide partnerships through business/industry and public agency employee attendance, local publicity, and providing expert speakers and case studies, if needed

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Activity 4 Partnerships with Business Associations, Chambers of Commerce, and Other Business-Oriented Organizations. Coordination with Local Business Development Programs for Outreach to “Hard-to-Reach” Businesses.

Develop partnerships with business organizations to co-sponsor educational outreach to members, and community-based programs targeting small- to mid-size businesses.

Description

Partnerships with business organizations are essential for the business outreach component for three major reasons: (1) The Permit requires (page 59, subsection dd) Co-permittees to promote public participation through cooperative outreach such as “adopt-a” programs. A more effective alternative to “adopt-a” programs is developing local business partnerships, which are not only cooperative, but also target audiences that have been prioritized. (2) Business organizations serve as credible messengers for the business owners, managers, and employees who are members. Therefore, educational programs that are co-sponsored with these organizations have the potential to be more effective than similar programs sponsored by the governments of the County and Co-Permittees alone. (3) The business community has little free time -- by partnering with their business organizations and communicating through their existing meetings and newsletters, an opportunity has been created to deliver targeted stormwater messages in a relevant and time-saving manner.

Relationships and partnerships with mid- to large-size business/trade organizations can expand the message distribution avenues and activities, and supplement program costs through the following:

- ◆ Educational forums and/or seminars to communicate BMP “how to” information and provide posters, signage and other materials for use in the work place (Activities 1, 2, 3)
- ◆ Targeted small-space advertising in trade publications and association newsletters (Activity 6)
- ◆ News articles, case studies and other educational media relations in trade publications and association newsletters (Activity 5)
- ◆ Targeted direct mail to managers of specific industries (within this Activity)
- ◆ Participation in business/industry events, trade shows and conferences (Activity 3)
- ◆ Distribution of materials at meetings, membership drives and information counters (Activities 1, 2)

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Independently-owned and community-based businesses typically do not affiliate with the mid- to large-sized business/trade organizations, yet they represent a vast number of stormwater polluters and potential polluters. Reaching these “mom and pop” businesses will involve working with local business development offices, community-based programs and organizations and vendors. Motivating factors for adopting stormwater pollution prevention practices focus on cost, value and regulatory compliance. Many of the activities listed above are applicable to this business/industry sub-set, but will have to be adjusted for a more grassroots, one-on-one effort.

Timing/Frequency -- Activity 4

- | | |
|--|----------------|
| ◆ Create a database of potential partners:
Associations, corporations, non-profit, special interest | By end of 1997 |
| ◆ Develop a partnership information package | By end of 1997 |
| ◆ Solicit partnerships | 1998 - 2001 |
| ◆ Implement partnerships | 1998 - 2001 |

County Responsibilities

- ◆ Identify countywide professional associations with whom to develop the most effective partnerships, based upon target audiences, membership and level of activity of the organization. Develop and maintain a contact database
- ◆ Identify countywide pollution prevention organizations and other environmental education programs that target similar segments of the business community and develop effective partnerships to coordinate and share outreach. Develop and maintain a contact database
- ◆ Solicit countywide alliances with Chambers of Commerce and other business-oriented organizations to expand message distribution, enhance credibility of messages and activities, and to supplement program costs
- ◆ Provide printed BMP materials as needed for mailings, information counters, etc.
- ◆ Develop trade associations' publications list for news bureau and provide news articles for trade association newsletters
- ◆ Incorporate business/industry activity-specific information into news bureau
- ◆ Develop educational materials co-sponsored with business associations
- ◆ Prepare news articles for trade publications and association newsletters
- ◆ Develop targeted direct mail to managers of specific industries

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County Responsibilities, cont.:

- ◆ Develop presentation/exhibit materials for participation in business/industry events
- ◆ Develop a “Guide to Local Partnerships” manual as a resource and reference for Co-permittees working on the local level

Co-permittee Responsibilities:

- ◆ Identify business/trade organizations with which to partner for programs and information distribution
- ◆ Identify appropriate local business events in which to participate
- ◆ Support local and countywide business/trade association events with personnel and local information
- ◆ Provide media list of local business/trade organizations’ newsletters and publications
- ◆ Utilize the “Guide to Local Partnerships” to create business/industry grassroots outreach opportunities

Note to Co-permittees:

The range of ways for Co-permittees to satisfy this requirement is quite wide -- from minimal to highly participatory. Examples include: (1) have a telephone conversation with, and send a letter to the manager of the local Chamber of Commerce to inform him/her of County-sponsored workshops that will be available to businesses in the community. The manager of the Chamber would then be able to pass along important information about the workshops to members. (2) Provide BMP materials to local businesses for distribution to the public at the check-out counters or information centers. (3) Enlist financial and “in-kind” support from major businesses or organizations to co-sponsor local stormwater education events, such as providing meeting room space at no charge, contributing money to cover a portion of the costs of the event, or providing expert speakers, refreshments or free samples. (4) Participate in a local event as a speaker or provide materials to attendees.

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Activity 5 Targeted Trade and Business Media Relations

Trade association newsletters/publications, professional periodicals, the business section of daily and weekly newspapers, and business-oriented radio and television.

Description

Business people get substantial information related to their professions from a variety of periodicals -- such as trade association newsletters/publications (discussed in Activity 4), professional periodicals, the business section of daily and weekly newspapers, and business-oriented radio and television.

The basic components of a business/industry media relations campaign will be incorporated into the overarching General Public/Residents media relations program discussed in the previous section (Activity 3).

Specifically these components include:

- ◆ Overarching media information kit including modular countywide and city-specific business/industry information
- ◆ Media releases reporting on or announcing business/industry events, issues and activities around the County
- ◆ Media advisories announcing business/industry events or specific happenings
- ◆ Editorial placements in trade publications, business reporters of newspapers, radio and television
- ◆ Meetings with editorial boards to encourage coverage and support of business stormwater pollution prevention
- ◆ Public service announcements

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Timing/Frequency -- Activity 5

- | | |
|---|-------------------------|
| ◆ Develop database of media outlets/publications | By end of 1997 |
| ◆ Draft business/industry operations plan for News Bureau | By end of 1997 |
| ◆ Distribute media advisories and releases, and place appropriate stories | 4th quarter 1997 - 2001 |
| ◆ Draft and distribute “Guide to Local Business Media Relations” manual | 1st quarter 1998 |

County Responsibilities -- Activity 5

- ◆ Develop a business publications list including association and organizational newsletters
- ◆ Supplement the News Bureau discussed in General Public/Residents Activity 3 with business-related case studies, resources, references
- ◆ Develop a “Guide to Local Business Media Relations” manual to serve as a reference and resource for Co-permittees’ local media relations efforts
- ◆ Draft and distribute media releases reporting on or announcing countywide activities, events and issues. Provide “template” releases to the Co-permittees in advance of the release date for localized use
- ◆ Develop and place countywide business stories

Co-permittee Responsibilities -- Activity 5

- ◆ Utilize the “Guide to Local Media Relations” manual to implement media relations activities within the community -- press releases, story placement and PSAs

Optional:

- ◆ Provide the countywide News Bureau with local case studies, media outlet lists, resources and references

IMPLEMENTATION BY TARGET AUDIENCE

Activity 6 Targeted Small-Space Print Trade and Business Advertising

Printed advertising targeted to specific industries through business periodicals, trade association, union, and chamber of commerce publications, and community and ethnic newspapers.

Description

The advertising campaign within this audience will be limited to small-space print advertisements that are placed in specific and targeted business and industry publications. The message(s) will be focused on educating business readers about particular clean business practices in the industry that is the subject of the publication. General awareness ads that speak to a broad range of businesses as a group are *not* part of this program. In addition to media buys in trade and business publications, print advertising space will be purchased in appropriate local community and ethnic newspapers to reach the small, mid-size and “mom and pop” businesses.

A series of small-space template “good practice” ads for each of the high-risk businesses will be developed along with ads for other potentially high-polluting businesses as determined and directed through the Model Programs. These ads will incorporate and follow the overarching approach discussed in Chapter III, Five-Year Public Education Plan Overview. These templates will be available to the Co-permittees as photostats or on computer disk for placement in their community newspapers as part of their local media plan and in appropriate City agency and departmental newsletters.

If a Co-permittee has a business recognition program, it can use the “good practice” ad templates and add the business logo(s) to acknowledge the specific businesses that are doing a good job while educating other businesses about the practices they implement in their operations.

IMPLEMENTATION BY TARGET AUDIENCE

Targeted Publications -- Activity 6

- ◆ Trade and business monthly publications for the high-risk businesses (many of these are glossy national publications and will have reach outside the Southern California area)
- ◆ Local trade and business publications published by local organizations such as unions, trade associations, chambers of commerce, small business organizations, ethnic business associations and vendor newsletters
- ◆ Community-based and ethnic newspapers
- ◆ Public agency, City and departmental newsletters
- ◆ Business websites as appropriate

Timing/Frequency -- Activity 6

- | | |
|---|--------------------------------------|
| ◆ Develop annual business media buying plan | December 1997, 1998, 1999, 2000 |
| ◆ Concept and create small-space print ads | 1st quarter 1998, 1st quarter 1999 |
| ◆ Purchase print ads | As per media buying plan |
| ◆ Develop template print ad series | 1st quarter 1998
1st quarter 2000 |

County Responsibilities -- Activity 6

- ◆ Develop series of small-space print advertising templates and make these available to Co-permittees as photostats or on disk
- ◆ Provide language interpretation of print ad series, as needed
- ◆ Develop a countywide media buy in business periodicals and publications produced by unions, trade associations, chambers of commerce
- ◆ Provide information/ideas for localizing advertising messages for Co-permittee use
- ◆ Negotiate, as available, PSA space in these publications

Co-permittee Responsibilities -- Activity 6

- ◆ Supplement County media buys by funding additional buys in the local market

Optional:

- ◆ Negotiate PSA space in the local market

IMPLEMENTATION BY TARGET AUDIENCE

Activity 7 Advanced Technology and Telecommunications

Websites, E-mail.
1-888-CLEAN-LA and local hotline numbers.

Description -- Websites and E-mail

Many segments of the business community are moving toward advanced technology to acquire information -- particularly websites. In the first quarter of 1997, several websites were under development by the United States Environmental Protection Agency (EPA) and will be providing information to and for the following businesses:

- ◆ automotive service and repair shops -- "GreenLink"
- ◆ metal finishing industry -- "National Metal Finishing Resource Center"
- ◆ printing industry -- "Printer's National Compliance Assistance Center"
- ◆ agricultural businesses including growers, livestock producers and other agribusiness -- "Ag Center"

Other similar EPA websites are anticipated to come on-line in the coming years. These sites, combined with other existing organizational and city sites, provide ample information for not only business and industry, but also the general public and public agency employees to obtain information without the expense of County and Co-permittees developing a website exclusively for stormwater/urban runoff management.

Sample Organizational Websites:

- ◆ <http://www.smbay.org> (Santa Monica Bay Restoration Project)
- ◆ <http://www.americoceans.org> (American Oceans Campaign)

Sample City Websites:

- ◆ <http://www.ci.santa-monica.ca.us> (Santa Monica)
- ◆ <http://www.ci.long-beach.ca.us> (Long Beach)

IMPLEMENTATION BY TARGET AUDIENCE

The important aspect of using existing websites is to promote the <http://www.> address whenever and wherever possible, and for the County and Co-permittees to link these addresses with websites they already have in operation or are planning for the future.

Description -- 1-888-CLEAN-LA and Local Hotline Telephone Numbers

The County of Los Angeles currently advertises and operates 1-888-CLEAN-LA and several of the larger Co-permittees have their own hotline telephone numbers. The County's 24-hour hotline number allows callers to find out about household hazardous waste roundups and used oil recycling as well as to report clogged catch basin inlets, and dumping and illicit discharge violations.²³ The County already has placed this phone number in all appropriate County telephone directories.

As of July 1997, the County infrastructure capability and capacity of the 1-888-CLEAN-LA phone number makes it able to handle thousands of calls per day. Over the next four years, the County intends for the 1-888 number to evolve and encompass all environmental programs, as well as provide proactive information and opportunities to get involved. This evolution will expand its current exclusive use of providing roundup dates, used oil recycling locations and report pollution violations.

Coordination between the County and the Co-permittees with individual hotline numbers is important for dissemination of cohesive information and call handling.

Timing/Frequency -- Activity 7

- | | |
|--|--|
| ◆ Research existing, applicable websites.
Disseminate information to Co-permittees | In progress, ongoing
On-going through Channel
Bulletin |
| ◆ Produce 1-800/888 Information Guide Manual
to aid in cohesive information dissemination | 1st quarter of 1998 |
| ◆ Promote 1-888 CLEAN-LA number | In progress, ongoing |

²³ NPDES Permit, page 30, II. Illicit Connections and Illicit Discharges, D. Public Reporting.

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 7

- ◆ Research the internet on a regular basis for new websites coming on-line. Disseminate new address information to the Co-permittees
- ◆ Include these resource websites in the County News Bureau
- ◆ In the event a County of Los Angeles website is developed, include the stormwater BMP information as provided by the Model Programs and link all appropriate and related websites to its design
- ◆ Operate effectively and continue to expand the information provided by the 1-888-CLEAN-LA hotline number
- ◆ Provide a guide manual to Co-permittees with individual 1-800 hotlines that provides an information and call handling resources link allowing cohesive dissemination of pollution prevention practices
- ◆ Promote 1-888-CLEAN-LA through as many vehicles as possible (media relations, flyers, posters, advertising, News Bureau, etc.)

Co-permittee Responsibilities -- Activity 7

- ◆ Provide addresses for new websites to the County News Bureau as they come on-line
- ◆ Promote the addresses of existing websites through appropriate channels (e.g., newsletters, publications, media releases)
- ◆ In the event a Co-permittee has a City website or develops a City website, include the stormwater BMP information as provided by the Model Programs
- ◆ If a Co-permittee 1-800 hotline number already is in operation, it should be reviewed and updated, if necessary, with an infrastructure that will effectively disseminate information about pollution prevention practices in a consumer-friendly manner
- ◆ Work with the County and utilize the provided guide manual to coordinate information and call handling between the County and the Co-permittees so the system appears to be seamless throughout the County
- ◆ Promote both the 1-888-CLEAN-LA and local number through as many vehicles as possible (media relations, flyers, posters, advertising, etc.)

IMPLEMENTATION BY TARGET AUDIENCE

Activity 8 Business/Industry Speakers Bureau

County and local experts who can lend credibility and educate about “good housekeeping” pollution prevention practices.

Description

Organizations such as chambers of commerce, local chapters of unions and trade associations, and trade shows and conferences are ideal forums to present stormwater pollution prevention information to large groups of business people. In most cases, these are regularly scheduled meetings with set formats, and little effort -- other than making a request -- is required on the part of the County or Co-permittees to make a presentation.

Members of the speakers bureau should reflect a wide range of businesses on both a County and Co-permittee level. They should be representative of businesses and organizations throughout the County (WMAs and Co-permittees) that have proven their commitment to “good housekeeping” and anti-pollution practices. They should be experts and role models, as well as good communicators. The information that is distributed at speakers’ engagements is discussed under Activities 1 and 2.

Timing/Frequency -- Activity 8

- | | |
|--|---------------------|
| ◆ Create speakers bureau membership list and train members | 1st quarter of 1998 |
| ◆ Create database listing of potential organizational meetings | 1st quarter of 1998 |
| ◆ Schedule monthly speaking engagements | 1998 - 2001 |

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 8

- ◆ Create speakers bureau membership list (County and Co-permittee experts) and train members
- ◆ Create database listing of potential countywide organizational meetings
- ◆ Schedule speaking engagements with organizations that have countywide representation

Co-permittee Responsibilities -- Activity 8

- ◆ Create database listing of potential local organizational meetings
- ◆ Schedule local speaking engagements so that a qualified representative of the Co-permittee's local public works department can communicate stormwater pollution prevention messages to the local business community
- ◆ Notify the County of local meetings that would be appropriate to provide speakers

IMPLEMENTATION BY TARGET AUDIENCE

Activity 9

Create a Database Clearinghouse of Organizations Providing Loans and Grants for Public Education and Compliance Activities

Description

Grants and other funding opportunities exist on a local, state and federal level through a variety of organizations. These opportunities can provide financial assistance for programs designed by the County and/or Co-permittees to create and distribute educational materials, develop and implement pilot programs, and purchase specialized anti-polluting equipment for small businesses, just to name a few. A sample of the grant and funding opportunities that exist include the Environmental Protection Agency (EPA), California Integrated Waste Management Board (CIWMB) and local foundations with monies apportioned for environmental outreach efforts.

In most instances, in order to receive grant monies, an application must be completed and the proposed program must be described with goals, specific activities, projected results and estimated budget. The application process and timeframe varies from organization to organization; however, for most Co-permittees it is an untapped opportunity for additional funds.

Timing/Frequency -- Activity 9

- | | |
|---|------------------------|
| ◆ Create database of funding organizations | By end of 1997 |
| ◆ Update/maintain database | Ongoing through 2001 |
| ◆ Distribute updates and information on available grants to Co-permittees | Quarterly through 2001 |
| ◆ Provide application response counsel to respondents | As needed |

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 9

- ◆ Create database of funding organizations
- ◆ Update/maintain database
- ◆ Distribute updates and information on available grants to Co-permittees
- ◆ Provide application response counsel to respondents

Co-permittee Responsibilities -- Activity 9

- ◆ Notify County of any available funding opportunities for inclusion in the database

Optional:

- ◆ Submit applications for additional funding

IMPLEMENTATION BY TARGET AUDIENCE

◆ BUSINESSES ◆

The following table provides a snapshot of the relationships that exist between the activities. For example, Activity 1 BMP Printed Materials is a component of Activity 3 BMP Workshops & Forums (as materials that are distributed), Activity 4 Business Partnerships (as materials that are included in outreach packages), Activity 5 Media Relations (as materials included in media information packets), Activity 7 Advanced Technology and Telecommunications (as materials that can be distributed through these avenues) and Activity 8 Speakers Bureau (as leave-behinds at speaking engagements).

TABLE: RELATIONSHIPS BETWEEN ACTIVITIES

	1. BMP Printed Materials	2. Other Educ. Materials	3. BMP Workshops	4. Business Partnerships	5. Media Relations	6. Print Advertising	7. Advanced Technology & Telecommunications	8. Speakers Bureau	9. Grants & Loans Clearinghouse
1. BMP Printed Materials			◆	◆	◆			◆	◆
2. Other Educ. Materials				◆	◆			◆	◆
3. BMP Workshops				◆	◆	◆		◆	◆
4. Business Partnerships	◆	◆	◆		◆	◆	◆	◆	
5. Media Relations	◆	◆	◆	◆					
6. Print Advertising	◆		◆	◆			◆		◆
7. Advanced Technology & Telecommunications	◆	◆			◆	◆			◆
8. Speakers Bureau	◆	◆							
9. Grants & Loans Clearinghouse	◆	◆	◆	◆	◆	◆	◆	◆	

IMPLEMENTATION BY TARGET AUDIENCE

◆ BUSINESSES ◆

The following table illustrates the relationship of activities to the goals stated on pages 72 and 73. For example, all nine activities address the first stated goal of increasing awareness among businesses about stormwater pollution prevention and its value, and specifically about the problem of illicit discharges/dumping and proper discharge/disposal practices.

TABLE: RELATIONSHIPS BETWEEN GOALS & ACTIVITIES

	1. BMP Printed Materials	2. Other Educ. Materials	3. BMP Workshops	4. Business Partnerships	5. Media Relations	6. Print Advertising	7. Advanced Technology & Telecommunications	8. Speakers Bureau	9. Grants and Loans Clearinghouse
Increase awareness among business/industrial and construction audiences	◆	◆	◆	◆	◆	◆	◆	◆	◆
Work with businesses and agencies to overcome BMP compliance hurdles	◆	◆	◆	◆			◆	◆	◆
Increase number of construction businesses who are very knowledgeable to 55%	◆	◆	◆	◆				◆	◆
Increase number of auto repair businesses who are very knowledgeable to 53%	◆	◆	◆	◆				◆	◆
Increase number of restaurants who are very knowledgeable to 42%	◆	◆	◆	◆				◆	◆
Encourage County & Co-permittees to develop a resource clearinghouse				◆			◆	◆	◆
Coordinate w/Model Programs	◆	◆	◆	◆	◆		◆	◆	

IMPLEMENTATION BY TARGET AUDIENCE

◆ SCHOOL EDUCATION ◆

Situation Analysis Overview

While there is little existing statistical information on children and their polluting and pollution prevention behaviors, it is generally accepted that children are commonly the trend setters or “influencers,” the people who break ground for the widespread changes of the future. For example, children have been the critical players in the education/action process for the recycling movement. Recycling activities that are conducted in the classroom and schoolwide, either curriculum projects or as fund-raisers, almost always translate into direct or indirect parental involvement. Either the parent has to collect glass, aluminum or plastic for their children to take to school, or they are reminded by their children during the course of normal family life to recycle that glass, aluminum or plastic bottle.

While children have been very successful home messengers for recycling; in reality, they don’t naturally segment environmental issues into individual topics like recycling, used oil or water pollution. Teachers and other adults tend to do that and present them as specific topics -- sometimes in a related context and sometimes as separate subjects presented throughout the year. Pollution prevention should be taught to children as a single overarching topic and reinforced as such throughout the year.

Curriculum Challenges

The challenge faced by Los Angeles County and its Co-permittees -- the same challenge found with the General Public/Residents audience -- is to rise above the clutter and become known for materials that are teacher-useful and student-helpful. This means the materials must be:

- ◆ fun and enjoyable;
- ◆ flexible with supportive resources;
- ◆ appropriate for specific grade levels;
- ◆ do-able within potentially limited classroom budgets, resources, and time;
- ◆ expandable beyond the curriculum and the classroom; and,
- ◆ contain practical and usable information that can be interwoven into science, math, art and other curriculum subjects for greater reach and re-enforcement.

IMPLEMENTATION BY TARGET AUDIENCE

The effectiveness of the school education program will be reinforced by the materials, activities, the “messenger,” and its ability to carry beyond the classroom. This is particularly true when activities can be developed that require family involvement and that tie back into and support programs within the General Public/Residents.

Youthful Motivation

Information from teachers indicates that children in the K-3 grades have the most natural curiosity and are the most motivated and enthusiastic to carry messages home, and to share activities with their parents or guardians. As children get older -- 4th through 7th grades -- they more often share ideas and activities with their peers than with their parents, and curriculum activities should reflect this inclination. Activities should be designed for teams or groups of youth so they are part not only of the implementation process, but also in decision making and have some form of control over the final result. These children also can become team peer teachers, presenting their projects and accomplishments to the children in the lower grades. High school students require a different focus. While most are more concerned about themselves and their future, this self-interest can be translated into environmental “lessons” through career exploration programs.

The Los Angeles County School System

The 1,650 public schools, 1,320 private schools and 2 percent home-taught student population in Los Angeles County make the diversity of this population as daunting as the general population. Added to this challenge are the restrictive budgetary parameters that prevent schools from doing many of the basic educational activities they would like to do. This situation is complicated by the bureaucratic approval process to implement new programs even when funding is supplied.

IMPLEMENTATION BY TARGET AUDIENCE

Existing Programs

There are a large number of existing environmental education programs available in Los Angeles County including:

- ◆ the County's current elementary school assembly-style program which covers the spectrum of environmental topics from recycling to stormwater pollution and includes outreach beyond the classroom through community-based youth events
- ◆ the County's secondary environmental education school program created and conducted by Los Angeles-based TreePeople which covers the full range of environmental issues through the subject of solid waste management
- ◆ the County's annual sponsorship of the "Plan-It-Earth" program and competition for grades 6-9 in conjunction with Times in Education. This is a team competition to design and implement successful environmental projects including those impacting stormwater pollution. The complete Plan-It-Earth teachers' package includes project management guidelines, a poster timeline and teacher orientations providing step-by-step directions
- ◆ the City of Los Angeles' K-6 assembly-style program created and conducted by TreePeople which covers the full range of environmental subjects including recycling, water and air pollution, composting, etc.
- ◆ "Think Earth" Environmental Education Foundation's curriculum program for children in K-6. An instructional unit is provided for each grade level and each unit interrelates all elements of the environment - air, land, water and energy -- while emphasizing a specific theme. Each Think Earth unit contains: a teacher guide, two to three full-color posters, story cards, resource/product/trash cards, reproducible worksheet/activity masters and a video
- ◆ California Integrated Waste Management Board's "Closing the Loop," a curriculum-based, activity program for school and home designed for teachers and students, K-12

IMPLEMENTATION BY TARGET AUDIENCE

◆ SCHOOL EDUCATION -- GOALS ◆

- ◆ Introduce and initiate an anti-pollution ethic at an early age that should carry through to adulthood and to future generations.
- ◆ Develop (or integrate) this ethic into an umbrella pollution program that can be implemented with various grades of school children.
- ◆ Working with existing County and Co-permittee school education programs, ensure that by August 1999 elementary school-age children receive pollution prevention messages* every other year of their K-6 career.
- ◆ Working with existing County and Co-permittee school education programs, ensure that by August 1999 high school-age children receive pollution prevention messages (noted in above bullet) once in their 7-12 career.
- ◆ Provide information to school districts once per year on environmental/stormwater education resources.

*Note: The focus of these messages are specified in the NPDES Permit for school children: educate about the difference between sanitary sewers and storm drains; the importance of preventing stormwater pollution; illicit discharge reporting procedures; source minimization and general pollution prevention.

IMPLEMENTATION BY TARGET AUDIENCE

◆ SCHOOL EDUCATION ◆

Communications Approach

Given the existence of current and successful school education programs in Los Angeles County, an alliance with one or more of these programs is the most efficient and cost-effective method of communicating with school children.

More than 886,000 elementary school children are enrolled in Los Angeles County schools. For these K-6 children, the County's school assembly show and coordinating youth events will provide the vehicles to teach pollution prevention activities. For the County's more than 621,000 middle- and high school children, TreePeople's Secondary Student Environmental Education Program (SSEEP) will create a higher understanding of environmental issues and motivate teenagers to take action.

Both of these programs encompass a variety of environmental subjects, including stormwater water pollution. The subject content is in keeping with the findings of the focus group research and segmentation study which concluded that the education emphasis should be on providing practical, "how to" information rather than an analysis of the storm drain system.

◆ SCHOOL EDUCATION ◆

Snapshot of Activities

1. K-6 school assembly presentations and youth events
2. Secondary Student Environmental Education Program (SSEEP) presented by TreePeople

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- School Education

- ◆ Examine all existing, comprehensive school programs and develop an alliance with the programs best suited to meet the Five-Year Public Education Plan and NPDES goals and objectives:
 - integrates multiple environmental messages (e.g., recycling, water pollution, solid waste)
 - expandable beyond the curriculum and classroom
 - utilizes program activities/format that already has been approved by the schools and teachers
 - do-able within potentially limited classroom and County budgets, resources and time

Co-permittee Responsibilities -- School Education

- ◆ Encourage local school districts/systems to take advantage of selected Countywide programs

Note:

Co-permittees will not be responsible for distribution of materials to public or private schools within their respective jurisdictions.

IMPLEMENTATION BY TARGET AUDIENCE

◆ PUBLIC AGENCY EMPLOYEES ◆

Situation Analysis Overview

In their personal and professional lives, many Public Agency employees may unintentionally practice polluting-types of behavior. However, employees of the County Department of Public Works can and should be trained to serve as role models on the job and in their communities. The same is true for the 85 Co-permittees' public works employees and those employees of other County and City public agencies. Public agency employee participation in the Plan and their performance through individual jobs is critical to supporting the messages of the program and to whether the target audiences take these messages to heart.

This participation goes far beyond County equipment operators knowing not to discharge polluted water into a storm drain. It includes the people who answer dozens of telephone inquiries each day, maintain fleets of government vehicles, approve plans for new developments and attend regular meetings representing their government employers. While the actual cost of training is dependent upon the job of the employee, all employees must have knowledge of the stormwater/urban runoff public education program, the requirements of the NPDES Permit, consistent messages and correct pollution prevention practices.

Creating Role Models

Public agency employee training can be one of the keys to "having the house in order" and providing a built-in model for the rest of the County's population. The return on investment for building a sense of program ownership with County employees could be significant compared to the money spent. Employees will be affected by messages targeted to the general public; however, there is a need for specific collateral materials that more clearly define BMPs for government employees. Additionally, County and Co-permittees may have more direct authority to implement enforcement and reward incentives for employees to maintain good environmental practices. The NPDES Permit requires training that more clearly defines BMPs for government employees as well as requiring training for municipal employees (section V.C.1.b.iv). These employees are typically involved in construction, infrastructure maintenance, corporation yards, supervisory roles for these disciplines and those who respond to questions from the public.

IMPLEMENTATION BY TARGET AUDIENCE

Employee training will be conducted in three tiers: (1) training current employees with direct impact or the greatest potential for contributing to pollution; (2) training all new employees and all personnel in supervisory positions; and, (3) training employees with indirect impact or contribution.

◆ PUBLIC AGENCY EMPLOYEE -- GOALS ◆

- ◆ Motivate government employees to take ownership and see their role as the first line, “early adopters” of behaviors that prevent pollution.
- ◆ Conduct training sessions on stormwater/urban runoff pollution prevention practices for County and Co-permittee employees who have jobs with direct contact or impact (e.g., construction, fleet maintenance, building permitting, field jobs, public contact/information) on stormwater pollution (NPDES Permit, Page 45; Section C.3.b.v.; Page 48, Section C.6.b.v.aa.).
- ◆ Integrate stormwater BMP information in County and Co-permittee new employee training and orientation programs and/or information packets as designated by human resources/personnel office.
- ◆ Coordinate with Public Agency Model Program for maximum cost and performance efficiencies.

IMPLEMENTATION BY TARGET AUDIENCE

◆ PUBLIC AGENCY EMPLOYEES ◆

Communications Approach

Public agency employees will receive virtually all stormwater education materials and outreach through the agencies' workplace. Many of the activities described on the following pages involve the production of materials to integrate into other programs, such as public agency employee training. Continued coordination between the County and Co-Permittees as they implement these various programs is essential.

The focus of the public agency employee outreach program is to instill the knowledge and motivation to this special target audience so that they become "early adopters" of a wide range of best management practices as well as ambassadors of pollution prevention messages in their local communities. The benefits of this effort are multi-fold and critical to the overall program:

- ◆ Public agency employees can do their part to prevent the generation of stormwater/urban runoff pollutants from a wide range of activities
- ◆ The stormwater pollution prevention movement needs role models. Municipal employees are in the position to demonstrate to the general public, through their daily practices, that best management practices are not only important but also relatively simple to incorporate into regular routines
- ◆ The overall education program will gain credibility by the actions of "early adopters" leading the way. Viewed another way, at least one other major stormwater education program in California reported that it suffered serious lack of credibility when municipal employees did not follow the best management practices that the public was being asked to implement.²⁴

²⁴ Los Angeles County Department of Public Works, Stormwater/Urban Runoff Public Education Program. *Research Report on Issues, Pollutants and Materials*. Prepared by Rogers & Associates; Harris & Company, with Larry Walker Associates, Inc.; Pelegrin Research Group; Lang, Murakawa & Wong; Valencia, Perez & Echeveste. October 1, 1996.

IMPLEMENTATION BY TARGET AUDIENCE

◆ PUBLIC AGENCY EMPLOYEES ◆

Snapshot of Activities

1. Training (NPDES Permit C.1.b.iv)
2. “How To” Printed Materials Developed To Support Training/Forums, Model Programs, Illicit Disposal Outreach, Emergency Notification, Employee Training and Public Agency In-house forms of communications
3. Public Agency Employees Incorporated into the Businesses Audience Workshops; Provide Materials for Specialized Workshops/Forums Targeting Activities Within the Model Programs
4. Inclusion of Public Agency Information in News Bureau

IMPLEMENTATION BY TARGET AUDIENCE

Activity 1 Public Agency Employee Training

NPDES Permit C.1.b.iv. Page 60.

Description

Public Agency Employees who are involved in stormwater-related activities will be trained in pollution prevention practices. A cost-effective and efficient method of complying with this Permit requirement is for Co-permittees to work cooperatively with each other to hold joint training sessions or forums, share newsletter information and/or field checklists. Printed materials adaptable for this training activity will be developed in the Businesses audience Activities 1 and 2, and in this section under Activity 2 on the following page. For specific activities' materials that might not be incorporated into the materials already being produced -- but are required by the Permit for Public Agency Employees -- BMP materials will be developed and produced.

Specifically, as per the Permit, employee training with supporting materials will include:

- ◆ Emergency spill cleanup procedures and hotline numbers (Section V.C.1.iv.aa)
- ◆ Awareness of environmentally-sensitive alternative products (Section V.C.1.iv.bb)
- ◆ Good housekeeping practices (Section V.C.1.iv.cc)

The *Public Employee Training Manuals, Volumes I and II* which were prepared to meet the immediate outreach requirement (Section V.A.1.a.iii) will provide the foundation and format for employee training. Updates to these manuals will be provided by the County on an "as needed" basis.

Timing/Frequency -- Activity 1

- ◆ Employee training sessions: Following the approval of the Model Programs²⁵ by the RWQCB

²⁵ Please note that the Model Programs will be submitted individually, with deadlines ranging from March 31, 1997 to December 1, 1997. The development of BMP materials for each of these areas will be staggered accordingly.

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 1

- ◆ Conduct appropriate training sessions. *Recommended, but not required:* Work collaboratively with the Co-permittees to conduct joint sessions and send employees to the workshops conducted under the Businesses audiences as appropriate (as discussed in Activity 3 of this section). *Further recommended:* Invite appropriate businesses to attend relevant training workshops for public employees

Co-permittee Responsibilities -- Activity 1

- ◆ Conduct appropriate training sessions. *Recommended, but not required:* Work collaboratively with other Co-permittees to conduct joint sessions and send employees to the workshops conducted under the Businesses audiences as appropriate (as discussed in Activity 3 of this section). *Further recommended:* Invite appropriate businesses to attend relevant training workshops for public employees

IMPLEMENTATION BY TARGET AUDIENCE

Activity 2 Production/Distribution of Printed Materials to Support Training, Forums, Model Programs and Employee Outreach Programs

“How to” materials/fact sheets adapted for or tailored to public agency employees to support training, model program needs, illicit disposal outreach, emergency notification, employee training and in-house communications avenues.

Description

As much as possible, the printed materials produced under the Businesses audience, Activities 1 and 2, pages 76 and 79, will be utilized for public agency employees. These materials are comprised of (1) an overview BMP handbook, (2) BMP fact sheets for specific activities and (3) other collateral printed materials (e.g., posters, signage). The materials developed in Businesses, Activities 1 and 2, will focus primarily on high-risk businesses and business activities identified under the various BMP Model Programs.

For specific activities that might not be incorporated into the materials produced for the Businesses audiences -- but are required by the Permit for Public Agency Employees -- BMP materials will be developed and produced. As noted in the previous activity (Employee Training), based on the Permit, input from the Model Programs and the business/industry baseline research, this includes:

- ◆ Emergency spill cleanup procedures and hotline numbers (Section V.C.1.iv.aa)
- ◆ Awareness of environmentally-sensitive alternative products (Section V.C.1.iv.bb)
- ◆ Good housekeeping practices (Section V.C.1.iv.cc)

For example, if required by any of the model programs, additional BMP training materials will be developed and/or updated in the *Public Employee Training Manuals, Volumes I and II* which were prepared to meet the immediate outreach requirement (Section V.A.1.a.iii).

IMPLEMENTATION BY TARGET AUDIENCE

Distribution -- Activity 2

The BMP printed materials will be distributed to Public Agency employees in the following manner:

- ◆ Through County and Co-permittee training programs
- ◆ By managers and supervisors of applicable County and Co-permittee departments to employees that: (1) have the potential to impact the storm drain system; and, (2) interact with the public on issues that could impact the storm drain system
- ◆ In new employee orientations/information packets
- ◆ Existing public agency in-house distribution avenues such as newsletters, staff meetings, bulletin boards, e-mail, paycheck stuffers
- ◆ County News Bureau

Timing/Frequency -- Activity 2

The schedule for producing BMP materials discussed under the Businesses audiences and that are adaptable to public agency employee use is as follows:

- ◆ Overview handbook: Following the approval of the Five-Year Education Plan by the RWQCB. Estimated production date -- Winter 1997
- ◆ Specific BMP fact sheets/check lists: Following the approval of the Model Programs²⁶ by the RWQCB

The overview handbook will be designed first and “group printed” with a quantity anticipated to supply the needs of the County and the Co-permittees for a minimum of two years. It is anticipated that the initial overview handbook will be updated and reprinted during year three, producing a supply that will last the remainder of the Five-Year Plan.

²⁶ Please note that the Model Programs will be submitted individually, with deadlines ranging from March 31, 1997 to December 1, 1997. The development of BMP materials for each of these areas will be staggered accordingly.

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 2

- ◆ Develop additional activity-specific, concise “how to” BMP materials that are not already being produced within the Businesses audience
- ◆ Adapt Businesses audience materials to public agency employee use, as needed
- ◆ Provide language translation/adaptation to appropriate materials, as needed
- ◆ Coordinate with other Model Programs
- ◆ Develop a “group printing” system that provides Co-Permittees the ability to purchase materials at the lowest cost possible and with labor-efficiencies
- ◆ Distribute materials through available in-house communications channels

Co-permittee Responsibilities -- Activity 2

- ◆ Purchase materials through the County’s “group printing” system of BMP materials and distribute them through in-house communications forums including: newsletters, training classes, field personnel, bulletin boards and interdepartmental forums
- ◆ Distribute materials through in-house communications avenues
- ◆ Add City-produced materials to packets, as appropriate

IMPLEMENTATION BY TARGET AUDIENCE

<p>Activity 3 Incorporate Public Agency Employees into Business Workshops Invite public agency employees to the workshops produced under the Businesses audience.</p>

Description -- Workshops In Conjunction With Businesses Audience

BMP workshops for certain businesses and business activities are discussed in this section under Businesses audience, Activity 3, page 82. The attendance outreach to these workshops will include County and Co-permittee public agency employees who hold related job responsibilities. Notification to public agency employees of upcoming workshops will be disseminated through the communications channels discussed within this audience, Activity 2, page 113.

Timing/Frequency -- Activity 3

Public Agency Employee Participation in BMP Workshops Conducted In Businesses Audience

Beginning in 1998, workshops for businesses will be produced at the rate of six (6) every other year. Public employees who are most likely to benefit from these workshops are working in the following fields: vehicle/fleet maintenance, food services, planning and construction activities, inspections, parks and recreation, grounds and building maintenance and public works.

Businesses Workshops (Also see Businesses audience, Activity 3)

Beginning in 1998, produce six (6) every other year in auto repair, restaurant and new development/construction, and three (3) Phase I businesses/activities.

Forums/Partnerships

Trade associations and businesses will be invited to participate in County/Co-permittee-sponsored workshops. In addition, the County and Co-permittees will provide outreach and education (forums, trade shows, conferences, expert speakers, etc.) through a business/trade partnership twice annually (See Businesses audience, Activity 4).

IMPLEMENTATION BY TARGET AUDIENCE

Materials For Workshops/Forums Targeting Specialized Activities Outlined in the Model Program

- ◆ To coincide with the production of new BMP fact sheets/check lists for the Model Programs²⁷
- ◆ Training materials will be reviewed during Year Three and updated if necessary (all new/updated materials should be placed in the *Public Employee Trainer Manual, Volumes I and II*, as appropriate)

County Responsibilities -- Activity 3

- ◆ Develop and produce workshops (see Businesses audience, Activity 3). Inform Co-permittees of the workshop focus and schedule to enable participation of public agency employees countywide
- ◆ Develop and produce new training materials required by the Public Agency Employee Model Program to augment the existing *Public Employee Trainer Manual, Volumes I and II*
- ◆ Review new BMPs that result from all Model Programs, and update and/or develop training materials as needed
- ◆ Prepare informal training materials for County use, including employee recognition/incentive program, and provide copies to Co-permittees as examples

Co-permittee Responsibilities -- Activity 3

- ◆ Notify appropriate public agency employees to attend appropriate businesses workshops
- ◆ Use training materials to fulfill requirements of the Public Agency Employee Model Program and NPDES Permit and other permitting requirements (Section V.1.b.iv.dd)
- ◆ Incorporate updated training materials into existing Trainer Manuals; provide retraining of existing employees and new employees as necessary to comply with the NPDES Permit

²⁷ Please note that the Model Programs will be submitted individually, with deadlines ranging from March 31, 1997 to December 1, 1997. *The Public Employee Trainer Manual, Volumes I and II* will be reviewed and updated following a similar staggered schedule.

IMPLEMENTATION BY TARGET AUDIENCE

Activity 4 Inclusion of Public Agency Information in News Bureau

Timely distribution of public agency information to news media from a central source; distribution of countywide information to Co-permittee agency/department publications.

Description

The development of media information and the management of a County News Bureau is discussed on page 49 of the General Public/Residents section. Media information related specifically to public agencies and their employees should be part of the News Bureau.

The type of public agency employee media information that should be included in the News Bureau is:

- ◆ listing of applicable County and Co-permittee agency/departmental newsletters
- ◆ listing of other applicable publications including employee and professional/trade associations, unions and other public employee groups and organizations not already included in the Businesses media list
- ◆ County and Co-permittee spokespersons and information resources
- ◆ case studies of innovative public employee programs and achievements

Timing/Frequency -- Activity 4

- | | |
|--|----------------|
| ◆ Develop database of media outlets/publications | By end of 1997 |
| ◆ Draft public agency employee operations plan for News Bureau | By end of 1997 |

IMPLEMENTATION BY TARGET AUDIENCE

County Responsibilities -- Activity 4

- ◆ Develop a public agency publications list including departmental, association and organizational newsletters
- ◆ Supplement the News Bureau discussed in General Public/Residents Activity 3 with public agency-related case studies, resources, references
- ◆ Draft and distribute on a quarterly-basis media information reporting on or highlighting activities, County and Co-permittee pollution prevention accomplishments, events and issues. Provide “template” releases to the Co-permittees in advance of the release date for localized use

Co-permittee Responsibilities -- Activity 4

- ◆ As appropriate, provide County News Bureau with local agency/departmental case studies, media outlet lists, resources and references. Update information to County quarterly
- ◆ Include appropriate information provided by County news bureau in agency/departmental newsletters and other existing forms of in-house communications. Dissemination of information should be on a quarterly-basis

IMPLEMENTATION BY TARGET AUDIENCE

◆ PUBLIC AGENCY EMPLOYEES ◆

The following table provides a snapshot of the relationships that exist between the activities. For example, Activity 1 Employee Training is a related component of Activity 2 Printed Materials (distributed at the training sessions), Activity 3 Workshops/Specialized Forums (incorporating Public Agency Employees into Businesses audience workshops), and Activity 4 News Bureau (an in-house communications vehicle to announce training sessions).

TABLE: RELATIONSHIPS BETWEEN ACTIVITIES

	1. Employee Training	2. Printed Materials	3. Business Workshops/ Specialized Forums	4. News Bureau
1. Employee Training		◆	◆	◆
2. Printed Materials	◆		◆	◆
3. Business Workshops/ Specialized Forums	◆	◆		◆
4. News Bureau		◆	◆	

IMPLEMENTATION BY TARGET AUDIENCE

◆ PUBLIC AGENCY EMPLOYEES ◆

The following table illustrates the relationship of activities to the goals stated on page 108. For example, all four activities address the first stated goal of motivating government employees to take ownership and see their role as the first line of “early adopters” of behaviors that prevent pollution.

TABLE: RELATIONSHIPS BETWEEN GOALS & ACTIVITIES

	1. Employee Training	2. Printed Materials	3. Business Workshops/Specialized Forum	4. News Bureau
Motivate employees to take ownership and see role as "early adopters"	◆	◆	◆	◆
Conduct training sessions	◆	◆	◆	◆
Integrate information into newsletters, in-house communications	◆	◆	◆	◆
Coordinate with Model Program	◆	◆	◆	◆